

**SUPREME COURT MINUTES
THURSDAY, DECEMBER 22, 2016
SAN FRANCISCO, CALIFORNIA**

S216878 B242644 Second Appellate District, Div. 7 **PEOPLE v. MIAMI NATION
ENTERPRISES**

Opinion filed: Judgment reversed

Having clarified the legal standard and burden of proof for establishing arm-of-the-tribe immunity, we express no view on whether the parties have had the opportunity to fully litigate their claims under that standard. The trial court may examine that issue on remand. For the reasons above, we reverse the judgment of the Court of Appeal and remand for further proceedings consistent with this opinion.

Majority Opinion by Liu, J.

-- joined by Cantil-Sakauye, C. J., Werdegar, Chin, Corrigan, Cuéllar, and Kruger, JJ.

S224853 B243788/B247392 Second Appellate District, Div. 1 **AUGUSTUS (JENNIFER) v.
ABM SECURITY SERVICES,
INC.**

Opinion filed: Judgment reversed

We accordingly reverse the Court of Appeal's judgment on this issue.

Majority Opinion by Cuéllar, J.

-- joined by Cantil-Sakauye, C. J., Werdegar, Chin, and Liu, JJ.

Concurring and Dissenting Opinion by Kruger, J.

-- joined by Corrigan, J.